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Hand Delivered

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station – 2nd Flr.
Boston, MA 02110

**Re: Ratepayer Parity Trust Fund
D.T.E. 01-45**

Dear Secretary Cottrell:

Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company (together, “NSTAR Electric”) have reviewed the initial comments of other persons that were submitted in this proceeding and have only brief comments to offer in reply.

First, NSTAR Electric is pleased to note that all commenters appear to agree with the idea that the monies accumulated in the Ratepayer Parity Trust Fund should be utilized for the benefit of customers. While there are slightly varying ideas as to how best to utilize those funds,¹ it is clear that essentially all customers are facing extraordinary costs, either current or deferred, associated with implementation of the Restructuring Act and achievement of mandated rate reductions. Under these circumstances, it would be a shame if the monies were not utilized for the benefit of customers whose original rate payments, and the generating units funded by those rates were the source of the monies in the Fund.

Second, NSTAR Electric suggests that the most direct step that the Department can take at present (apart from continuing to work with the Division of Revenue to assure that the Fund is properly credited with the appropriate amount of tax revenues) is to establish a process and a

¹ NSTAR Electric is not necessarily in agreement with all of those ideas as to the suggested use of the Fund or as to how the Fund should be allocated; however, the primary point is that the monies should not be left unused.

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suitable time frame for distribution companies to apply for utilization of the Fund. The precise details of a particular claim are best resolved on a case-by-case basis.

NSTAR Electric appreciates the opportunity to provide these reply comments and looks forward to continuing to work with the Department as it addresses this issue.

Respectfully submitted,

cc: Andrew Kaplan, Hearing Officer